



**Office of the New York State
Attorney General**

**Letitia James
Attorney General**

February 25, 2025

Hon. Anne M. Nardacci
United States District Court
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

Re: *Brooks v. Farina, et al.*, 25 CV 68 (N.D.N.Y.)

Dear Judge Nardacci:

In the above referenced action, the Office of the Attorney General (OAG) represents Defendant Daniel Martuscello, has certified Defendants Danielle Medbury and Kyle Danshaw to be represented by private counsel pursuant to Public Officers Law § 17, and is processing the requests for representation from Defendants Michael Along, Matthew Galliher, Nicholas Kieffer, David Kingsly, and Shea Schoff. I write to request an extension of time to April 14, 2025 for Defendants Martuscello, Medbury, Danshaw, Along, Galliher, Kieffer, and Kingsley to answer or otherwise respond to the complaint to allow Defendants time to confirm and retain representation.

This request is made in accordance with Public Officers Law § 17(2)(c), which requires the OAG to take necessary steps on behalf of a State employee to avoid the entry of a default judgment pending resolution of questions pertaining to the State employee's representation.

Counsel for Plaintiff has consented to this request. No prior extensions have been requested by these Defendants. Counsel for Defendant Schoff has appeared and the Court has extended Defendant Schoff's answering deadline to April 14, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

s/ WILLIAM A. SCOTT
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